

AGENCY: ENVIRONMENTAL PROTECTION AGENCY (EPA)

TITLE: "Local-Scale Air Toxics Ambient Monitoring"

ACTION: Request for Applications (RFA)

RFA NO: OAR-EMAD-05-16

CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NO: 66.036

SUMMARY: Formal Agency responses to questions/comments regarding the subject solicitation.

DATE: July 20, 2005

Question 1: There were two tribal grants last year, FY2004, which I believe included the Gila River cooperative project and the Nez Perce Project on Pulp and Paper emissions. I would like to know what these projects entail and how the tribes are implementing them. We would like to submit a project grant app ourselves and would like to get a general idea of what the OAR is looking for in the area of innovative research from tribal air programs. I'm thinking other tribal air folks may be interested as well. Any help would be greatly appreciated.

Answer 1: There were three tribal grants awarded in response to RFA OAR-EMAD-03-08; the Gila River and Salt River Indian Communities are part of the "Phoenix Area Monitoring for the Joint Air Toxics Assessment Project (JATAP)," and the Nez Perce Tribe's "Characterization of Air Toxics Concentrations Around a Kraft Pulp and Paper Mill Facility, Lewiston, Idaho." The workplans for both projects, to include project-specific contact information, are available at <http://www.epa.gov/ttn/amtic/toxfy04.html>.

Question 2: I'd like to get clarification on a couple of issues related to eligibility. First, I want to be sure that state governments/agencies, local governments / agencies, and Federally recognized Tribal governments/agencies are eligible to apply and receive the grants. Second, I want to ask if a subgrant to a university must be competitively bid.

Answer 2: You are correct in your understanding of eligibility. Regarding whether a recipient must compete its subgrants, the Agency certainly encourages competition, but does not / can not require recipients to do so. However, please note the distinction between / differing requirements for acquiring services and products via contract versus establishing a subgrant relationship (see Section II Part E of RFA OAR-EMAD-05-16).

Question 3: The solicitation seems to preclude true partnerships, e.g., between a tribal government and a state university. The solicitation seems to impose a requirement to manage a competition on a tribal government that the tribal government may not have the resources to carry out. Is my reading of the RFP correct?

Answer 3: The RFA does not preclude an eligible entity from forming a sub-relationship with, as referenced in your question, a state university (Section II Part E of RFA No OAR-EMAD-05-16 states "Subgrants or sub-awards may be used to fund partnerships with universities, non-profit organizations, or another eligible entity as described in Section III.>"). Regarding project management responsibilities, a successful recipient must be capable of managing their grant. That said, a recipient may draw upon the experience / expertise of a number of resources to include the EPA Regional Project Officer, the cognizant EPA Grant Specialist, and their own sub-recipient(s) / partner(s), to gain helpful insight in managing their grant.

Question 4: In the RFA for Local-Scale Air Toxics Ambient Monitoring grant solicitation, section D.1 the model QAPP template is not listed at the URL given.

Answer 4: You are correct; the model QAPP template is posted at <http://www.epa.gov/ttn/amtic/airtoxqa.html> under the title "Model QAPP for Local-Scale Monitoring Projects."

Question 5: Is it correct that agencies which received funding under the previous air toxics local-scale monitoring competition (RFA OAR-EMAD-03-08) are not eligible to apply under this solicitation?

Answer 5: Agencies which received funding under the previous air toxics local-scale monitoring competition (RFA OAR-EMAD-03-08) are eligible to apply under this solicitation. However, in the interest of capacity building, preference may be afforded to those applicants who did not receive an award under the previous competition, as suggested by the language contained in Section V.B.1 of the RFA.

Question 6: In section I.B.4.b, evaluating air quality models is listed as a justification for community-scale monitoring. Does this mean that EPA might fund some modeling work under this RFA, or will money be used only for monitoring that could be used to validate separately funded modeling efforts?

Answer 6: Monitoring for purposes of evaluating / validating existing air quality models, to include executing model runs as an integral part of the project, may be considered an acceptable objective / justification for community-scale monitoring projects.

Question 7: I've started looking into the grant writing process. I have not written one before. I'm beginning by acquiring information and research. At the URL <http://www.epa.gov/seahome/grants.html> titled EPA Grant-Writing Tutorial, it says: This program is currently being revised to reflect recent changes in EPA policy and is temporarily unavailable for viewing or download from this Web site. A new version of the program should be available here soon. Being summer and

having a time-line for grant submittal August 22, and knowing how some things take more time than planned, do you have any idea when this might be back on line? Is this program valuable/needed for this task?

Answer 7: The grant writing tutorial to which you refer is an EPA Region V software package; unfortunately, this program will be unavailable during the open period for this RFA. An alternate resource for your use in developing your application is the EPA's Office of Grants and Debarment URL (<http://www.epa.gov/ogd/>). Also, the project plans for grants awarded under the previous year's local-scale monitoring solicitation are available for review at <http://www.epa.gov/ttn/amtic/toxfy04.html>.

Question 8: Would a CAFO (hog factory) be considered an air toxic source?

Answer 8: Principle emissions from Animal Feeding Operations (AFOs) include particulate matter, ammonia, hydrogen sulfide, and Volatile Organic Compounds (VOCs). There may be components of the emitted particulate matter (e.g., some metals), as well as some VOCs, that are listed as Hazardous Air Pollutants or HAPs (listing is available at <http://www.epa.gov/ttn/atw/orig189.html>). Though AFOs are considered neither major nor area sources, a variety of agricultural operations, to include AFOs, are being assessed for relevance and significance as HAP sources.

Question 9: Can the grant funds be used to build / outfit and operate a mobile monitoring platform?

Answer 9: Establishing a mobile monitoring platform, in and of itself, does not constitute an acceptable project. If such an activity simply represents the most cost-effective means by which data will be collected (i.e., the equipment and supplies portion of a larger project proposal), it may be acceptable as a project element, but not an entire project. The solicitation is clear in terms of acceptable project categories / broad objectives and criteria against which each proposal will be evaluated; to receive due consideration, an applicant must ensure their proposed project design is consistent with / responsive to the information presented in the RFA.

Question 10: The RFA states that the project period will be 18-24 months. Can you tell me what the likely time-frame is for project approvals and funding to be made available so I can gauge the likely beginning and ending dates of the project period?

Answer 10: The post-selection / pre-award period duration can vary greatly, largely dependent upon the number and degree of administrative, technical, and programmatic matters to be addressed during negotiations between the awarding EPA Region and the prospective grant recipient.

That said, we anticipate awards during the 4th quarter of CY2005 and 1st quarter of CY 2006; funding will be made available upon award.

Question 11: Are State Universities eligible to apply for the Local-Scale Air Toxics Ambient Monitoring funding opportunity (RFA No OAR-EMAD-05-16)?

Answer 11: No. However, state universities are eligible as subgrantees under this competition; as stated in Section II Part E of RFA No OAR-EMAD-05-16, "Subgrants or sub-awards may be used to fund partnerships with universities, non-profit organizations, or another eligible entity as described in Section III."

Question 12: Today we have this great application where we have this problem with Air Toxic X at Location Y, and are writing our proposal around that specific problem. Based on our planning etc. with this grant proposal, we don't expect to begin sampling until 1 year after the grant is awarded. By that time the original problem may have subsided because the local and state government has taken actions to resolve the problem. However, we feel confident that there are other very similar problems to address, perhaps involving a different air toxic and a different location, and there could potentially be another "hot spot" that the community gets up in arms about. Could we, one year into the grant, petition EPA to allow us to change the target (i.e. specific air toxic) and the specific location, if we otherwise follow all the original plans?

Answer 12: Given that the total duration of these projects is 18-24 months (to include all data analysis, presentation of results, and final report submitted and accepted), a proposal in which sampling is not expected to begin until a year after the grant is awarded may not be viewed favorably, dependent upon the justification provided in the project plan. Regarding the premise that the original problem for which the application is being submitted may have subsided due to local or state government action, and that "...there could potentially be another "hot spot" that the community gets up in arms about..." likewise may not be viewed favorably. There are many communities with problems for which there is little to no potential for local / state government involvement to address the issue (i.e., the award of a grant from this RFA may represent the only real opportunity to address the matter of concern). Further, the EPA proposal reviewers endeavor to achieve a balanced set of projects via the selection process; a post-award change of focus may result in some form of redundancy, contrary to program objectives. However, one option may be that if evidence such as monitoring data were available prior to the referenced local / state actions, the project emphasis could be to measure the effectiveness of those actions. Finally, a recipient can "...petition EPA to allow us to change the target (i.e. specific air toxic) and the specific location, if we otherwise follow all the original plans." However, this is not a preferred scenario.

Question 13: Is there any funding limitation for equipment installation / maintenance labor costs?

Answer 13: There are no such limitations. Carefully consider, however, in developing your proposal that awards resulting from this RFA must contain all requisite elements of a “complete” project to include data analyses and well-articulated expected outcomes; all applications will be evaluated according to the criteria stated in Section V of RFA OAR-EMAD-05-16.